Before the FEDERAL COMMUINCATIONS COMMISSION

DA 25-219 Released: March 12, 2025
RE: DELETE, DELETE, DELETE
GN Docket No. 25-133

Comments Due: Friday, April 11, 2025

SUMMARY:

With this filing, Turbo Technical Services ("TTS") makes comment in the above noted proceeding, requesting Commission consideration of deletion or modification of specific Rules and Regulations as outlined in the Public Notice. TTS has been involved in FCC application and licensing process since 1981 and has filed thousands of applications for hundreds of clients for AM, FM and FM translator stations and modifications. Their extensive experience with FCC processes gives them a unique and real-world view of the impact of Commission Rules and Regulations.

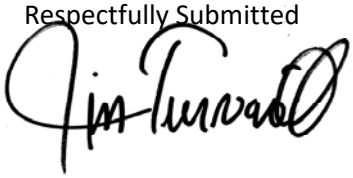
COMMENT:

TTS requests review of language in 73.207(b) with reference to protection to "the third (600 kHz above and below)" with respect to all FM stations. This is referred to as "Third Adjacent Protection" and should be examined.

This technical regulation is a hold-over from the last century when FM receivers utilized simple tuning circuits of discreet components that beat against a local oscillator. Since the 1980's that technology has been replaced by Phase-Locked-Loop direct FM tuning circuits, making input tuning much more sensitive and discriminating. Experience in the LPFM and Translator service has demonstrated that low power stations to not cause or receive interference from Third-Adjacent stations, and this protection is obsolete for those services. A reduction or elimination of the Full power Third-Adjacent protections should be considered in light of current technical advancements in FM receivers. Commission record will show that this was examined 25 years ago in the NCE service, when Third-Adjacent protection was changed from the 80dBu to the 100dBu interfering contour; as an acknowledgement then of the changes in FM receiver technology. The 21st Century technology demands a re-examination of this rule.

The site restrictions caused by these rules force licensees to operate at less than optimal locations, offer restricted coverage area and service to their communities and often operate at less than allowed effective radiated power. These restrictions can also limit the viability of an FM signal as well as its marketplace value, often as a deterrent to ownership because of the restricted service area.
A thorough review of these technical restrictions is hereby encouraged.

Respectfully Submitted



Jim Turvaville, Owner
Turbo Technical Services